

**Division Of Environmental Health
Solid Waste Program
410 Willoughby Avenue, Suite 303
Juneau, Alaska 99801-1795
<http://www.state.ak.us/dec/home.htm>**

**Telephone: (907) 465-5162
Fax: (907) 465-5362**

June 4, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Donna Williams, Mayor
City of Klawock
POB 113
Klawock, Alaska 99925

RE: Solid Waste Permit # 9913-BA002

Dear Ms. Williams:

The Department of Environmental conservation has completed its evaluation of your permit application dated March 13, 2001 to operate a municipal solid waste transfer facility, burn clean wood & paper, and dispose of construction & demolition waste, and sewage sludge. This permit also allows the City of Klawock to have a Class III municipal waste contingency disposal cell in the case there is an equipment failure or an interruption of transshipment services out of Craig/Klawock. The Department is issuing this permit in accordance with AS 46, 18 AAC 14, and 18 AAC 60. Please review the conditions and stipulations in the permit and ensure they are all understood. This permit is effective upon issuance and expires June 4, 2006.

Any person who disagrees with this decision may appeal by requesting an adjudicatory hearing, using the procedures contained in 18 AAC 15.200-310. Hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Juneau, Alaska 99801-1795, within 30 days of receipt of this letter. If a hearing is not requested within 30 days, the right to appeal is waived. Even if an adjudicatory hearing has been requested and granted, all permit conditions remain in full force and effect.

Sincerely,

Heather T. Stockard
Solid Waste Program Manager

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cc. Loraine Marshall, ADGC/Juneau

**STATE OF ALASKA
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL HEALTH
410 WILLOUGHBY AVENUE, SUITE 303
JUNEAU, ALASKA 99801**

**CLASS III MUNICIPAL
SOLID WASTE DISPOSAL PERMIT**

**CITY OF KLAUOCK SOLID WASTE DISPOSAL FACILITY
KLAUOCK, ALASKA**

PERMIT #9913-BA002	Page 2 of 15 DATE ISSUED: June 4, 2001
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This permit is issued to the City of Klawock to operate a municipal solid waste transfer facility, burn clean wood & paper, and dispose of construction & demolition waste and sewage sludge. This permit also allows the City of Klawock to have a Class III municipal waste contingency disposal cell in the case there is an equipment failure or an interruption of transshipment services out of Craig/Klawock. The boundary of the transfer facility and landfill site is located within the Phase I footprint according to the application dated March 13, 2001 in Section 32, Township 73 South, Range 81 East, Copper River Meridian, and at approximately mile 5 Craig-Klawock Highway. This permit is issued under the provisions of Alaska Statute 46.03, and Alaska Administrative Code, 18 AAC 15, 18 AAC 60, 18 AAC 70, 18 AAC 72 as amended or revised, and other applicable state laws and regulations. This permit is effective June 4, 2001 and expires June 4, 2006. It may be terminated or modified in accordance with AS 46.03.120.

This permit is subject to the conditions and stipulations contained in the following Appendices:

Application Compliance	Page 4
Appendix A: Operation of Facility	Page 4
Appendix B: Monitoring and Reporting of Landfill	
Associated Surface Waters	Page 11
Appendix C: Visual, Explosive Gas Monitoring	
And Corrective Action	Page 12
Appendix D: General Permit Conditions	Page 14

Appendix A, Section 1 of this permit applies to all operations within the boundary of the facility. Sections 2, 3, 4, and 5 of Appendix A are requirements in addition to Section 1 that apply to specific respective operations within the facility.

Disposal of waste specified in Appendix A, Section 1A of this permit is prohibited and is considered a violation of Alaska Administrative Code. Other types of waste disposal may be requested by the permittee, but must be authorized by approval, permit modification or a permit amendment.

If disposal becomes necessary, the permittee shall dispose municipal solid waste only within the boundary of the contingency cell as described in the November 13, 2001 permit application. Prior notification and authorization from the Department is required in order to use the contingency cell. The Department shall be

notified no less than one month prior to the disposal of raw garbage into the contingency cell unless a shorter period is approved.

The landfill is small and waste is to be transshipped away from Klawock. The facility is to be provided with a surface run-on diversion system to control run-on by upgradient sources. A leachate collection is to be installed whereby leachate is captured and vented through a culvert in the downgradient aspect of the system provided water quality standard is met in the leachate. With on-going maintenance of these systems, compliance with the terms of this permit, regulations and the operational plan, the landfill is not expected to generate significant quantities of leachate or create a hazard to the public health or the environment.

Groundwater monitoring under 18 AAC 60.820 - 18 AAC 60.860 is not required for a Class III municipal solid waste disposal facility. The solid waste program believes that surface water monitoring is the most practical cost-effective way to detect potential releases from the landfill. The Department considers that water collected in the leachate collection system developed at the facility to be surface water. The monitoring requirements in Appendix B and Appendix C specify the surface water monitoring stations to be sampled, frequency, test methods, and reporting limits to be followed. Additionally, this permit requires the water quality monitoring of leachate seeps that migrate beyond the run-off control structure.

Heather T. Stockard
Solid Waste Program Manager

APPLICATION COMPLIANCE

- I. Operation of this facility is subject to the design and plans submitted in the application dated March 13, 2001, the conditions contained in the permit, and the solid waste regulations 18 AAC 60. If there is a conflict between the permit application and this permit, then this permit shall take precedence. A modification to this permit may be requested but must be authorized by the Solid Waste Program Manager before that modification is effective.
- II. Upon any change in land ownership, the permittee shall submit a copy of the deed or another legal document that identifies the landowner and
 - A. a copy of any lease agreement that is clearly relevant to the waste disposal activity; or,
 - B. a written statement signed by the landowner, showing that the landowner consents to the proposed activity.

PERMIT CONDITIONS

The permittee shall dispose of solid waste in accordance with the stipulations listed below:

APPENDIX A: OPERATION OF FACILITY

1. ITEMS APPLICABLE TO ALL WASTE HANDLING, STORAGE, AND DISPOSAL OPERATIONS WITHIN THE BOUNDARY OF THE FACILITY
 - A. Prohibitions
 - 1) The permittee shall prohibit the disposal of liquid petroleum products, waste oil, contaminated soil, regulated asbestos containing material, unsterilized medical waste, septage, chemical waste, pesticides, radioactive material, solvents, acids, corrosives, lead-acid batteries, polychlorinated biphenyl (PCB) fluids, explosives, and any other hazardous waste defined and regulated under 40 CFR 261 at the landfill facility. If a hazardous substance or hazardous waste is found to have been deposited at the site, the permittee shall report the incident to the Department of Juneau Solid Waste Program Office within 10 days of discovery.
 - 2) Bulk or noncontainerized liquid waste may not be placed in the landfill. Containers holding liquid waste may not be placed in the landfill unless the container holds one gallon of liquid or less.
 - 3) The permittee shall require that all containers for disposal which exceed 5 gallons in size are open and empty of fluids prior to acceptance at the facility to ensure that no oil or hazardous waste liquids are deposited in the landfill.
 - 4) The permittee shall prohibit public access to the sludge disposal area.
 - 5) The permittee shall prohibit public access to the landfill during a burn.

B. Separation Distances

- 1) The permittee shall maintain a minimum horizontal separation distance of 50 feet between the designated portion of any storage or active waste disposal area and the facility boundary.
- 2) An open burn shall be located within the facility boundary no less than 50 feet from any area where waste has been buried, no less than 50 feet from the permitted facility boundary and no less than 50 feet from facility structures.
- 3) A distance of 50 feet shall be maintained between the areas where waste is landfilled and where recycling, storage, or transshipment takes place.

C. Fences, Gates, Signs and Access Control

- 1) The permittee shall maintain a readable sign at the entrance to the landfill, which includes the following information:
 - a. facility identification,
 - b. name of the permittee, address and telephone number,
 - c. emergency phone number,
 - d. user information such as operating hours, restrictions and any special disposal instructions, and,
 - e. indicate that some waste types are prohibited from disposal at the facility, such as hazardous waste, and list some of the more common prohibited wastes for the Klawock area such as oil, liquid septage, commercial fish processing waste, explosives, petroleum solvents, friable asbestos waste, etc.
- 2) The permittee shall post signs at the facility in order to direct the public to the proper waste storage, transfer, recycling and disposal areas.
- 3) The permittee shall ensure that:
 - a. a gate with a lock is maintained and the public restricted to the facility when an attendant is not present, and,
 - b. access roads and on-site roads are maintained in a well-drained condition and made kept passable by the operator and the public.

D. General Requirements.

The permittee shall:

- 1) ensure that litter, dust, odor, noise, traffic, and other effects from the operations at the facility do not become a nuisance or hazard to the health, safety, or property of persons at the facility or outside the facility boundary,

- 2) ensure waste is deposited at least two feet above the highest level of the original ground surface,
- 3) provide surface grading as needed to prevent surface ponding and runoff water from flowing over, into, or through deposited solid waste, or from accumulating in a disposal cell,
- 4) manage the facility to prevent a water quality violation,
- 5) manage the facility to prevent wildlife, domestic animal, and/or disease vector attraction,
- 6) collect littered waste and returned to the active disposal cell or transfer facility as needed on a regular basis, and,
- 7) prevent the leaking of pollutants, such as antifreeze, petroleum products, and battery acids, from leaking onto the ground from all scrap metal, equipment and other equipment stored or disposed at the site. All stored equipment shall be drained of all antifreeze and petroleum products. Ensure that any deposited vehicles are free of all liquid petroleum products and batteries.

E. Run-on, run-off and leachate control

The permittee shall:

- 1) grade and compact all areas within the facility boundary to minimize contact between stormwater and the waste,
- 2) prevent, contain, or control visible leachate seeps at the boundary of the facility,
- 3) construct and maintain drainage ditches to minimize contact between stormwater and the waste, and,
- 4) divert all surface water away from areas where waste is placed or has been placed.

2. ITEMS SPECIFIC TO THE CONSTRUCTION AND DEMOLITION WASTE DISPOSAL AREA

The permittee shall:

- A. consolidate and compact waste at only one working face. Cover will be applied as needed to prevent odor, blowing litter, fugitive ash dust, and vector attraction,
- B. make the waste disposal point and working face as small as practical,
- C. ensure that all non-salvageable containers (barrels, tanks or drums) are empty of fluids, have one end removed, and are crushed prior to burial, and,
- D. ensure that an intermediate cover of at least 12 inches of compacted soil that is graded to a 3(H):1(V) slope is applied to all areas of the construction and demolition waste area where

waste has been buried; and, where the area will not be used for disposal within 90 days after the last waste deposition.

3. ITEMS SPECIFIC TO SEWAGE SLUDGE DISPOSAL AND COMPOST

The permittee shall:

- A. dispose of dewatered sewage solids in accordance with the site and operational plan submitted to the department on March 13, 2001. Only one cell may be active at any time,
- B. disposed of treated sewage solids that meets the vector reduction requirements in 40 CFR 503.33(b)(11), adopted by reference in 18 AAC 60.505, or one of the
 - 1) Class A or Class B pathogen reduction requirements in 40 CFR 503.32, adopted by reference in 18 AAC 60.505; and
 - 2) the vector attraction reduction requirements of 40 CFR 503.33(b)(1) – (10), adopted by reference in 18 AAC 60.505.
- C. ensure sewage solids contain no less than 10% solids by weight,
- D. add lime as necessary to the sludge after disposal in order to control odors and dissuade vectors,
- E. in the event of any spills of sewage sludge outside the disposal area, take immediate measures to disinfect the affected area with lime and move the contaminated material into the disposal cell, and,
- F. ensure that sewage sludge and composted materials are handled:
 - 1) to prevent water quality violations,
 - 2) to prevent an odor nuisance, and,
 - 3) to prevent attraction by animals.

4. ITEMS SPECIFIC TO THE OPERATION OF A CLASS III MUNICIPAL LANDFILL CONTINGENCY CELL

The permittee shall:

- A. acquire departmental approval prior to disposal of municipal solid waste in the contingency cell. Disposal is contingent upon a breakdown of equipment or interruption in transshipment services. The Department shall be notified no less than one month prior to the disposal of raw garbage into the contingency cell unless a shorter period is approved,
- B. ensure surface run-on diversion structures and run-off control structures immediately adjacent to the contingency cell are in place and approved by the Department prior to disposal into the contingency cell,

- C. consolidate, compact, and cover the waste at the end of each operating day with a minimum of 6 inches of soil,
- D. ensure that only one working face for municipal waste is exposed at any one time. The working face shall be kept as small as practical, and,
- E. ensure medical waste or animal carcasses are incinerated, decontaminated, or sterilized and packaged to prevent a health hazard prior to disposal.

5. ITEMS SPECIFIC TO OPEN BURNING AND AIR QUALITY

The permittee shall:

- A. be restricted to burning uncontaminated wood, paper and landclearing waste,
- B. ensure that open burning does not cause black smoke, adverse public health or environmental impact, or nuisance. Wastes that cause black smoke, toxic or acidic gasses, or particulate matter are not allowed to be burned at this facility. Prohibited wastes include but are not limited to:
 - 1) pesticides,
 - 2) halogenated organic compounds,
 - 3) cyanic compounds,
 - 4) asbestos
 - 5) polyurethane products,
 - 6) asphalt, rubber products,
 - 7) plastics,
 - 8) tars, and,
 - 9) oils, oily wastes, contaminated oil clean-up materials
- C. ensure the burn achieves maximum combustion efficiency throughout the duration of the burn,
- D. restrict burning to only those times when smoke will not affect nearby residences or otherwise cause a nuisance, and,
- E. prevent fugitive ash dust emissions at the facility.

6. CLOSURE/POST CLOSURE STANDARDS

- A. Closure

The permittee shall within 90 days after the last waste was deposited at any disposal area that will not receive more waste within the year, or to any disposal area that has been filled to the final design elevation, provide closure as follows:

- 1) consolidate, compact and cover all deposited solid waste with a minimum of 24 inches or another thickness approved by the department of soil the last 6 inches of which is capable of being revegetated to the final design elevation,

- 2) compact and grade all side slopes no steeper than 3(H):1(V),
- 3) compact and grade all upper surfaces so that water will not pond or create erosion, and
- 4) revegetate all exterior surfaces with a short rooted native grass species within the first growing season after closure.

B. Post-Closure Care

- 1) The permittee shall provide an acceptable written post-closure care plan within 180 days prior to closure of any part of the landfill,

7. REPORTING AND RECORDKEEPING REQUIREMENTS

A. The permittee shall maintain an operating record for the facility. The record must consist of:

- 1) the permit application and the permit,
- 2) the solid waste management/operating plan,
- 3) records of the monthly visual inspection reports,
- 4) inspection records, training procedures, and notification procedures,
- 5) any as-built drawings or other maps of the landfill,
- 6) records of water quality monitoring and explosive gas monitoring,
- 7) incident and nuisance reports,
- 8) property deed information, and,
- 9) records of sewage sludge percent solids and treatment for vector attraction and pathogen reduction pertinent to EPA 503 rules.

B. The records must be retained at a location that is readily accessible by employees working at the facility and be available for department review. Upon request, the permittee shall furnish the operating record to the department, or shall make it available at reasonable times for department inspection.

8. MISCELLANEOUS

A. Should cultural or paleontological resources be discovered as a result of this activity, we request that the work which would disturb such resources be stopped, and that the Office of History and Archaeology, Division of Parks and Outdoor Recreation, Department of Natural Resources, be notified immediately (762-2622).

**APPENDIX B: MONITORING AND REPORTING OF LANDFILL ASSOCIATED
SURFACE WATERS**

1. The permittee shall quarterly monitor the monitoring stations established on Figure-3 of the permit application submitted March 13, 2001. The monitoring stations to be sampled are registered as SW-1 (upgradient background) and SW-3 (downgradient). Monitoring shall occur at least once during the time of each year when precipitation is highest (October/November) and at least once during the time of each year when precipitation is the lowest (February/March).
2. The permittee shall sample and analyze all seeps of any contact water found during visual monitoring where the seeps migrate beyond the leachate collection system and before the facility boundary. Also, the permittee shall collect a sample that is representative of background conditions at that time. Surface water must be sampled at the place where the highest concentration of hazardous constituents migrating off the facility will be detected, so that interference from sources of pollution unrelated to the facility's solid waste management operations will be minimized. Surface water shall be sampled on a schedule that is approved by the Department. Samples shall be taken at least during seasons of high flow and low flow each year during the operational, closure, and post-closure care phases unless another schedule is approved or required by the Department.
3. All water monitoring shall be conducted in accordance with approved QA/QC procedures. Test procedures for the analysis of water samples shall conform to the parameters, methods and procedures 18 AAC 60.820-860 and in the permit application dated March 13, 2001.
4. The permittee shall monitor for those parameters and reporting limits that achieve water quality standard using EPA approved methods found in Section 6.2, Table #1 of the permit application dated March 13, 2001. Results of analyses shall be submitted to the department within 30 days of the receipt of analysis. Upon request by the permittee, the department will review the results of the tests and determine if the sampling frequency may be reduced. The department may increase the testing frequency with any change in the design or operation of the landfill.
5. submit with the results of analysis:
 - A. record national weather service weather information for the day samples were taken and two days before,
 - B. date and time samples were taken, and,
 - C. identify each sample station on a map
6. The department will review the results of the initial tests and determine if the sampling frequency may be reduced. The department may increase or decrease the testing frequency with any significant changes in the design or operation of the landfill.
7. The permittee shall retain all records and information resulting from the monitoring activities required by this permit, including all records of analyses performed, calibration and maintenance of instruments, and recordings from continuous monitoring instrumentation in Alaska for observation by the department for three years after closure of the site. Upon request from the department, the permittee shall submit certified copies of such records.

APPENDIX C: VISUAL, EXPLOSIVE GAS MONITORING AND CORRECTIVE ACTION

1. VISUAL MONITORING

- A. The permittee shall ensure that a person who is familiar with permit requirements and with the operations plan, conduct a visual inspection of the facility once each month and document this inspection using the visual inspection checklist in the permit application submitted March 13, 2001.
- B. The permittee shall establish a path along the lower aspects of the landfill facility downgradient of the leachate collection system near the landfill boundary. The purpose of the path will be to conduct visual monitoring of the landfill and to observe for leachates.

2. EXPLOSIVE GAS MONITORING

- A. Methane will be monitored at least four times per year at crawl spaces and work areas inside facility structures and around the landfill at times of decreasing atmospheric pressure. The permittee may substitute alternative frequency of monitoring only upon receipt of prior written approval from the department.
 - 1) The results of explosive gas monitoring, including details about the dates, times of day, weather conditions, atmospheric pressure, and specific sampling stations, shall be reported to the Department quarterly, on March 1, June 1, September 1, and December 1, unless methane concentrations indicate more frequent sampling and reporting is necessary.
 - 2) If methane gas concentrations ever exceed 25% of the LEL (12,500 ppm) in facility structures or 100% of the LEL (50,000 ppm) at the landfill boundary, the department shall be immediately notified. The specific corrective action necessary, such as installation of active or passive gas ventilation system shall be determined in consultation with the Department.

3. CORRECTIVE ACTION

- A. If a structural change or damage to the facility occurs; or, a violation of a permit condition is observed during visual or surface water monitoring, or during a department inspection; the permittee shall take action to correct the change, damage, or violation to prevent the escape of waste or leachate, and to clean up any waste that may have been disposed of in a unauthorized manner.
- B. If monitoring reveals a change in water quality the permittee shall:
 - 1) determine the extent of contamination,
 - 2) determine if migration of waste or leachate from the facility is the cause of the change in water quality,
 - 3) estimate the potential for a violation of the water quality standards described in 18 AAC 60.035(3) at the facility boundary, or 50 feet from the designated portion of the facility, whichever distance is less,
 - 4) estimate the potential for a violation of the water quality standards described in 18

- AAC 60.035(4),
 - 5) take corrective actions to prevent a violation of the water quality standards, and
 - 6) notify the department within seven days after detecting a violation of the applicable water quality standards.
- C. Monitoring Records. The permittee shall maintain a record of all visual, chemical and physical monitoring inspections and any corrective actions taken, and make those records available to the department upon request.

APPENDIX D: GENERAL PERMIT CONDITIONS

1. ACCESS AND INSPECTION

The permittee shall allow the Commissioner or his/her representative access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, State laws, and regulations.

2. INFORMATION ACCESS

Except for information relating to trade secrets, submitted under a claim of confidentiality, and for which the Department has determined in writing that protection from disclosure is appropriate, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska Department of Environmental Conservation, Fairbanks Office, 610 University Avenue, Fairbanks, Alaska 99709-3643.

3. CIVIL AND CRIMINAL LIABILITY

Nothing in this permit shall relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.

4. AVAILABILITY

The permittee shall post or maintain a copy of this permit available to the public at the disposal facility.

5. ADVERSE IMPACT

The permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The permittee shall cleanup and restore all areas adversely impacted by the noncompliance.

6. CULTURAL OR PALEONTOLOGICAL RESOURCES

Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907-269-8721).

7. APPLICATIONS FOR RENEWAL

Applications for renewal or amendment of this permit must be made no later than 30 days before the expiration date of the permit or the planned effective date of the amendment.

8. OTHER LEGAL OBLIGATIONS

The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any permit that the Alaska Department of Environmental

Conservation or the U.S. Environmental Protection Agency has issued or may issue to the permittee. This permit does not relieve the permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the permittee pursuant to the terms of this permit and all plans implemented by the permittee pursuant to the terms of this permit shall comply with all applicable state and federal laws and regulations.

9. POLLUTION PREVENTION

In order to prevent and minimize present and future pollution, when making management decisions that affect waste generation, the permittee shall consider the following order of priority options: waste source reduction; recycling of waste; waste treatment; and waste disposal.